

**DECLARATION OF
PATRICK QUAID
ISO GOOGLE LLC'S
MOTION FOR
RELIEF RE
PRESERVATION**

**Redacted Version
of Document Sought
to be Sealed**

1 **UNITED STATES DISTRICT COURT**2 **NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**3 CHASOM BROWN, et al., on behalf of
4 themselves and all others similarly situated,

5 Plaintiffs,

Case No. 4:20-cv-03664-YGR-SVK

6 vs.

7 GOOGLE LLC,

8 Defendant.

9
10 **DECLARATION OF PATRICK QUAID**11
12 1. I am a Senior Software Engineer employed by Google LLC. I have been employed
13 at Google as an engineer since September 2012. I have been the Technical Lead for [REDACTED] since
14 2014. In my capacity as Technical Lead, I am ultimately responsible for the design, performance
15 and reliability of [REDACTED]. As part of my duties, I am personally aware of how [REDACTED] stores and
16 organizes the data, and the tools available to search and filter the data. I also have access to metrics
17 related to [REDACTED], including statistics related to the volume and size of the data stored. I make this
18 declaration based on personal knowledge and information provided to me by Google colleagues,
19 and if called to testify, I could and would competently testify to such facts.20 2. I understand the Court issued preservation orders in the above-captioned case,
21 requiring Google to preserve “all mapping and linking tables.”22 3. The [REDACTED] team is preserving certain mapping/linking tables. Storing one snapshot
23 of the tables will take approximately [REDACTED], and will grow at the rate of approximately [REDACTED]
24 [REDACTED] of storage per day.25
26 I declare under penalty of perjury that the foregoing is true and correct.

27 Executed on the 24th day of October 2022 at New York, New York.

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By: 
Patrick Quaid

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